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January 10, 1995

HAND DELIVER

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, Room 222
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: Omnipoint Corporation
Ex Parte Presentation; CC Docket No. 92-237

Dear Mr. Caton:

In conformity with section 1.1206(a) of the Commission's Rules, enclosed please find an original and two copies of an ex parte presentation to be submitted for inclusion in the above-referenced docket.

Should you have any questions concerning this matter, please contact the undersigned directly.

Sincerely,



Mark J. O'Connor
Counsel for Omnipoint Corporation

/mjo
Enclosures

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

January 6, 1995

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street NW
Washington, DC 20554

RE: Written Ex Parte Presentation by Omnipoint Corporation in CC Docket No. 92-237:
North American Numbering Plan

Dear Mr. Caton:

Omnipoint Corporation ("Omnipoint") has reviewed the materials and recommendations of the Interexchange Carriers Industry Committee (ICIC) Ex Parte notification in its September 20, 1994 meeting with the FCC. Omnipoint strongly supports the ICIC positions with regard to the administration of the North American Numbering Plan Administration (NANPA), the Oversight Committee, Arbitration, and the Recommendation/Summary. Omnipoint has some reservations about ATIS and, except for central office code administration centralization, does not wish to comment on Other Issues.

Most importantly, Omnipoint supports the position that there be neutral administration of NANP. Omnipoint believes that, historically, biases have existed in the allocation and assignment of numbering resources to wireless providers. Moreover, documented criteria and procedures for the allocation and assignment of these numbering resources were non-existent, such that it was difficult to evaluate potential inequities or discrimination. For these reasons, Omnipoint believes that the Industry Numbering Committee (INC) consensus developed guidelines provide the needed documentation, that the Industry should comply with these guidelines, and that a neutral third party numbering administration should utilize these guidelines to assign numbering resources in an impartial manner. To maintain this impartiality, included in the neutral third party NANP administration should be the centralized administration of central office codes.



Also of importance is that there be a dispute resolution process. Issues are usually introduced with a proposed time frame for resolution. Occasionally, consensus on a numbering issue cannot be reached by the industry forum such as INC. These instances should not be used to delay or inhibit competition. If the issue resolution time frame has passed and the industry cannot reach consensus, an independent mediation process should be invoked to try and achieve a consensus position. Absent agreement after mediation, the FCC should address the issue and order a decision. This would avoid undue delays in dispute resolution which might inhibit competition.

One reservation Omnipoint has with the ICIC recommendation is regarding ATIS. Omnipoint would only support ATIS as the sponsor with the understanding that ATIS only provide administrative support in terms of human resource management and have no control or influence in the consensus positions or oversight approval of INC guidelines/policies or in dispute resolution for INC. Although ATIS has just recently expanded its membership to include carriers other than Local Exchange Carriers (LECs) or Interexchange Carriers (IXCs), its Board, chairs, and membership are still dominated by the LECs. As such, the interests of wireless providers are not yet equally represented.

With the completion of the PCS auctions, there will be many more wireless providers seeking numbering resources to route and bill their services. In order that the problems of the past not be magnified by the multitude of new PCS providers, it is critical that a neutral administration of NANP be established soon. Omnipoint hopes that the Commission will take the broad Industry support shown for a neutral NANP under advisement and act quickly to establish an impartial administration of numbering resources.

This letter is being filed in conformance with Section 1.1206(a) of the Commission's rules. As required, two copies of this submission is being provided.

Best Regards,

A handwritten signature in cursive script that reads "Gary D. Jones".

Gary D. Jones

Director of Standards Policy